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UBER TECHNOLOGIES, INC.;  
RASIER, LLC; and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:  
  
ALL ACTIONS  
  
\_\_\_\_\_

Case No. 3:23-md-03084-CRB

**LAURA VARTAIN HORN DECLARATION  
IN SUPPORT OF DOCKET NO. 3495**

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I respectfully make this declaration in response to the Court's July 18, 2025 Order (ECF  
3 3508) and in further support of Defendants' Unopposed Administrative Motion for Order to Adopt  
4 Modified Briefing Schedule to Docket 3402 (ECF 3495):

5 2. Defendants filed ECF 3495 seeking to modify the schedule because Defendants  
6 inadvertently did not file their opposition to Plaintiffs' Motion to Quash Subpoenas to Law Firms (ECF  
7 3402) on July 8, 2025. Defendants' not submitting their opposition to the Motion to Quash was not  
8 intentional, but rather was the result of miscommunication in the context of a complex litigation, for which  
9 Defendants take full responsibility.

10 3. Defendants' not filing an opposition to the Motion to Quash was not the result of a  
11 conscious disregard of the Local Rules or the need for timely filings. Nor was it due to bad faith,  
12 inexcusable neglect, or gamesmanship. Defendants have not gained any strategic or litigation advantage  
13 from the delay.

14 4. Upon recognizing the miscommunication and corresponding missed deadline on July 15,  
15 2025, Defendants' counsel immediately reached out to Plaintiffs' counsel, who agreed to modify the  
16 schedule to permit briefing and a ruling on the merits.

17 5. Later on July 15, 2025, I and my co-counsel conferred with Plaintiffs' counsel, Andrew  
18 Kaufman, regarding Plaintiffs' position regarding ECF 3495 prior to filing, including to establish and  
19 agree upon the modified briefing schedule, which is set out at ECF 3495. Mr. Kaufman represented that  
20 Plaintiffs did not oppose Defendants' Unopposed Administrative Motion for Order to Adopt Modified  
21 Briefing Schedule in Support to Docket 3402 (ECF 3495).

22  
23 Dated: July 19, 2025

Respectfully submitted,

24  
25 By: /s/ Laura Vartain Horn  
26 Laura Vartain Horn (SBN 258485)  
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